

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Numbering Resource Optimization	)	CC Docket No. 99-200
	)	
National Thousands-Block Number	)	
Pooling Rollout Schedule	)	

**WORLDCOM COMMENTS**

On October 17, 2001, the Common Carrier Bureau released a public notice (DA 01-249) and sought comment on a proposed rollout schedule for national thousands-block number pooling. WorldCom, Inc. (WorldCom) respectfully submits these comments.

Release of the proposed rollout schedule is a welcome and long-anticipated development. The uncoordinated initiation of pooling by individual state “trials” has stressed industry resources in ways that a coordinated, national rollout can alleviate. A national rollout can provide carriers with greater certainty regarding where and when they must allocate the resources that are required to begin pooling in an NPA.

The benefits of a national rollout will be greatest if the schedule is balanced and predictable. WorldCom has two concerns in this regard with the proposed schedule. First, that it appears to deviate from the rollout policy that was previously announced. Second that it may open the door to even greater deviations that could stretch industry resources near to or possibly past the breaking point.

In the *First NRO Order*, the Commission tentatively concluded that the national rollout should encompass a maximum of three NPAs in each NPAC region per quarter.<sup>1</sup> The

---

<sup>1</sup> In the Matter of Numbering Resource Optimization, CC Docket No. 99-200, *Report and Order* (rel. March 31, 2000), ¶ 159.

Commission reasoned that “a staggered rollout will provide carriers time to upgrade or replace their SCPs and other components of their networks as necessary.”<sup>2</sup> To some extent, carriers have likely relied on this conclusion in both capital planning and staffing decisions. The proposed rollout schedule does not, however, strictly adhere to this framework. For example, the schedule includes four NPAs in California in the first quarter of the rollout. There are several other exceptions to the three NPAs per region per quarter policy in the proposed schedule.

By themselves, these deviations from the Commission’s announced policy might not overburden industry resources. WorldCom believes that it can comply with the proposed rollout schedule if no additional changes are made. But the public notice advises that the Bureau will consider petitions by state commissions to opt into the rollout schedule on a case-by-case basis.<sup>3</sup> This suggests that, in some cases, the rollout may end up covering many more than three NPAs per region per quarter. WorldCom urges the Bureau to consult with industry, and not only with NeuStar, before further accelerating the national rollout. If the rollout is too burdensome, the risk of errors harmful to network reliability will rise.

Respectfully submitted,

WorldCom, Inc.

---

Henry G. Hultquist  
1133 19<sup>th</sup> Street, N.W.  
Washington, D.C. 20036  
(202)736-6485

November 6, 2001

---

<sup>2</sup> *Id.*

<sup>3</sup> Public Notice at 2.